REMARKS

Claims 1-64 are pending. Claims 52-64 have been withdrawn. Applicants have amended claims 11 and 18 to make the language of the claims more explicit.

The Examiner is requiring restriction to one of the following groups of claims:

I. Claims 1-51
II. Claims 52-57
III. Claims 58-64

Applicants elect the claims of Group I without traverse.

The Examiner has objected to the drawings because in Figure 2 there are multiple occurrences of some of the reference characters. The multiple occurrences of the reference number are intended to reflect multiple occurrences of the same item. As such, applicants believe the Figure 2 is in compliance with 37 C.F.R. § 1.84(p)(4).

The Examiner has objected to the drawings asking for the adding of descriptive material to Figure 6. Applicants have modified Figure 6 to address the Examiner's concern.

The Examiner has objected to claims 4 and 19 under 35 U.S.C. § 112, second paragraph, as being indefinite. The Examiner believes that the data type definition of these claims is vague and unclear. Applicants respectfully disagree. As is well known in the art, an XML data type definition defines a very precise syntax for the claimed data structure. One skilled in the art would immediately recognize what is meant by the data type definition. The use of a data type definition is somewhat analogous to the use of a mathematical equation in a claim because the equation describes very precisely the mathematical operation to be performed.

The Examiner has rejected claims 1-3, 5-17, and 20-51 under 35 U.S.C. § 102(e) has been anticipated by Yalcinalp and claims 4, 18, and 19 under 35 U.S.C. § 103(a) as being unpatentable over Yalcinalp in view of Chen. Applicants respectfully disagree.

As an initial matter, it is unclear from the Office Action as to what element of Yalcinalp corresponds to the claimed "data source." In rejecting claim 1, the Examiner states "a data source identifier that identifies a data source to be used when the query specification is executed [note: figure 2; col. 5 lines 7-60]." (Office Action, August 19, 2003, p. 5.) Applicants have no idea what, in those 50+ lines of Yalcinalp, the Examiner believes corresponds to the claimed "data source." Applicants assume, however, that Yalcinalp's documents are source documents and that the user's request somehow identifies a document.

Yalcinalp describes a system in which a user issues a document request, and an XSLT processor transforms the document in accordance with a style sheet that is associated with the document, and the transformed document is sent to the user. The style sheet may specify a method of a component external to the style sheet. The XSLT processor initiates the execution of the method and may pass arguments that are defined in the style sheet. The XSLT processor then incorporates results of the executed method into the transformed document before sending it to the user.

Applicants' technique, in contrast, is directed to a technique for encapsulating a query definition that includes a query specification (i.e., query text and parameters), a data source identifier, and a transform. Various users can be provided with of copy of the query definition. A user can request execution of their copy of the query definition. During execution, the user may be requested to specify values for the parameters. The query text along with the values for the parameters are used to query the data source identified by the data source identifier. The parameters specify portions of the query text that can be changed by a user before the query is executed. The results of the query are then transformed based on the transform of the query definition. Applicants' technique thus provides a way for queries to be encapsulated so that query text, parameters, a data source, and a transform can all be described in a data structure (e.g., file) that can be provided to users.

Claims 11-17, 20-26, and 35-51 are directed to executing a query defined in a query specification against a data source that is identified in the query specification.

For example, claim 11 recites "identifying a data source from the query specification" and "requesting execution of the query specification with the identified data source to generate results." Yalcinalp neither teaches nor suggest that any query is executed against its documents. Rather, Yalcinalp's documents are simply transformed to a new format.

Claims 1-10 and 27-34 are directed to a data structure for a query definition that includes a query specification with query text and parameters, a data source identifier, and a transform. Yalcinalp neither teaches nor suggests such a data structure. Yalcinalp's document identifier is presumably received from a user, not retrieved from or stored in a data structure.

Claims 1-10, 13-15, and 31-33 explicitly recite a "parameter." A parameter can have its value set by a user before a query is executed. Yalcinalp does not teach such a setting of parameter values by users. Rather, Yalcinalp's parameter values are stored in a style sheet and retrieved when a method of the external component is invoked.

Claims 18-19 are directed to "a data structure for representing results of a query in a canonical format." These claims recite "each data element [of a row] having one or more values or table elements with row elements and data elements." A data element corresponds to the intersection of a row and a column (e.g., a cell of a spreadsheet). Figure 8 of Chen simply shows a table with two columns and ten rows. Each intersection of Chen's row and column, however, only contain a single value.

Based on the above amendment and remarks, applicants respectfully request reconsideration of this application and its early allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-8548.

Respectfully submitted,

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Date: 2/11/04

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